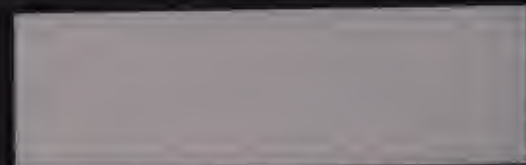


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May 2, 2016
File No. 01.0171521.10

Massachusetts Department of Environmental Protection
Northeast Regional Office
205 B Lowell Street
Wilmington, Massachusetts 01887

Re: Final Revised Public Involvement Plan
(Former) Everett Staging Yard
1 Horizon Way
Everett, Massachusetts
Release Tracking Number 3-13341

REF
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To Whom It May Concern:

GZA GeoEnvironmental, Inc. (GZA) has prepared this Final Revised Public Involvement Plan (PIP) on behalf of Wynn MA, LLC (Wynn), to outline proposed public involvement activities under the Massachusetts Contingency Plan (MCP, 310 CMR 40.0000).

1.00 INTRODUCTION

On April 8, 2015, Wynn, as owner of the above-referenced disposal site (the Site), received a petition from residents of the City of Everett requesting that the disposal site be designated as a PIP site in accordance with Massachusetts General Laws (MGL) c. 21E §14(a). This law requires that, upon receiving such a petition, a plan for involving the public in decisions regarding response actions must be prepared and a public meeting held to present the proposed plan. The Site was designated as a PIP site on April 28, 2015.

Since the Site has been classified as a Tier II site (see Section 2.00) under the applicable provisions of the MCP, the Licensed Site Professional (LSP) for the Site is responsible for overseeing response actions under the MCP, including the public involvement provisions of the regulations. The LSP for this Site is Larry Feldman (lawrence.feldman@gza.com; (781) 278-3807). Response actions to be conducted under the MCP include assessing the nature, source and extent of the contamination; evaluating risks related to Site conditions; assessing whether cleanup actions are necessary; and, if necessary, selecting and implementing the most appropriate actions. In addition, as a PIP site, the MCP provides opportunities for public involvement throughout the process.

Public involvement during the remedial response action process is undertaken to ensure that the public is both informed of and involved in planning for remedial response actions. Public involvement activities at a PIP site include preparation of a plan which identifies specific activities that will be undertaken to address public concerns to the extent possible.

This document is a Revised Public Involvement Plan for the (Former) Everett Staging Yard located at One Horizon Way in Everett. Section 2.00 contains background information on the Site, including environmental assessment and public involvement histories. Section 3.00



explains how the remedial response action process addresses community concerns which have been raised during the development of the Plan. Section 4.00 explains the proposed public involvement activities. Section 5.00 contains a schedule for public involvement activities. Section 6.00 outlines the roles and responsibilities of those involved in implementing the Public Involvement Plan. It also explains the procedures the Massachusetts Department of Environmental Protection (MassDEP) will use to address situations if the agency receives complaints about the manner in which the Plan is being implemented. Section 7.00 describes how the Plan will be revised in the future.

A draft of this revised Plan was presented by Wynn and GZA at a public meeting on February 17, 2016, at 6:30 PM in the third-floor City Council Chamber at Everett City Hall, at 484 Broadway. The public comment period for this revised plan ended on March 9, 2016. No comments were received.

2.00 SITE BACKGROUND

The following sections provide a description of the Site and surrounding area conditions and the Site's regulatory history. A Site Locus Plan is included as Figure 1, and a Site Plan is included as Figure 2.

2.10 SITE DESCRIPTION AND HISTORY

The Site is approximately 32.5 acres, which includes approximately 24.2 acres designated as the land-side portion of the Site, and an 8.3-acre portion of a cove adjacent to the Mystic River (the water-side portion of the Site). Access to the land-side portion of the Site is limited by the presence of a chain-link fence with two gates; the main access gate is in the eastern portion of the Site, along Horizon Way, and the second gate is located on the northern portion of the Site across an extension of Horizon Way and accesses the adjoining commercial/retail property. There are currently no buildings at the Site. The ground surface at the Site is generally either bituminous pavement (center), unpaved, or compacted coarse gravel. The ground surface of the land-side portion of the Site is generally flat.

The Site is adjoined to the northeast by a vehicle maintenance and repair facility operated by the Massachusetts Bay Transportation Authority (MBTA); to the southeast by properties along Alford Street, including a vacant commercial building and facilities operated by the Boston Water and Sewer Commission (BWSC) and the Massachusetts Water Resources Authority (MWRA); to the southwest by the Mystic River; and to the northwest by railroad tracks for the MBTA Commuter Rail, beyond which are several large commercial/retail buildings associated with the Gateway Center.

The Site is located within the Boston Basin, a regional depression of bedrock consisting primarily of Cambridge Argillite, a partially metamorphosed siltstone. Site conditions generally consist of fill over a variable sequence of naturally deposited organic soils, sand and gravel, and silty clay over weathered rock and bedrock. Filling over naturally deposited materials occurred in the area of the Site from the late 1800s through the early 1960s. More recent naturally deposited sediments along the shoreline include sand, silt, and organics. Additional fill was placed across the Site in the mid-1990s in the form of rock and fine-grained sediment ("tunnel muck") from the construction of the Deer Island Outfall.

Depth to groundwater ranges from approximately 4 to 10 feet. Groundwater at the Site flows generally toward the Mystic River.

According to a Massachusetts Geographic Information System (MassGIS) map, the Site is not located in or within 500 feet of a Zone II public water supply, a potentially productive aquifer, a Zone A surface water body, an Interim Wellhead Protection Area, a protected wetlands habitat, or an Area of Critical Environmental Concern. Protected open space associated with Gateway Park is located approximately 400 feet to the northwest of the Site.



According to historic reports, the Site was occupied by the Cochran Chemical Company, the Merrimac Chemical Company, and the Monsanto Chemical Company from the late 1800s until the late 1960s. These companies produced various acids and dyes at the Site. The buildings on the land-side portion of the Site were razed in the 1970s.

The land-side portion of the Site has been used primarily as a material storage and staging yard since the mid-1990s, when the tunnel muck was stockpiled on it.

2.20 ENVIRONMENTAL ASSESSMENT HISTORY

Investigations conducted between 1995 and the present have identified several contaminants in soil, groundwater, and sediments at the Site, including metals, volatile organic compounds (VOCs), volatile petroleum hydrocarbon (VPH) fractions and target analytes, semi-volatile organic compounds (SVOCs), extractable petroleum hydrocarbon (EPH) fractions and target analytes, and polychlorinated biphenyls (PCBs). The sources of contamination at the Site include past industrial operations, leakage from a former aboveground storage tank (AST), and the placement of contaminated fill. To date, response actions conducted at the Site have been limited to assessment activities only. No remediation has been conducted.

2.21 Environmental Assessment Conducted by Others

In 1995, Consulting Engineers and Scientists, Inc. (CES) of Lakeville, Massachusetts, performed a limited subsurface investigation at the Site prior to it being used as the tunnel muck stockpile area. Arsenic and lead concentrations in soil samples collected during the investigation exceeded the applicable MCP Reportable Concentrations (RCS-2). On January 18, 1996, O'Donnell Sand and Gravel ("O'Donnell"), the property owner at the time, submitted a Release Notification Form (RNF) to MassDEP, and MassDEP assigned RTN 3-13341 to the release. Later in 1996, the excavated tunnel muck and rock were stockpiled and/or spread across the upland portion of the Site. In mid-1999, some of the tunnel muck from the Site was used to cap a separate portion of the former Monsanto property, located across the railroad tracks to the west of the Site, as part of the construction of the Gateway Center Mall, but a 1- to 7-foot thick layer of the tunnel muck still remains at the Site.

In December 1996, CES conducted a Phase I Initial Site Investigation (ISI). Arsenic and lead concentrations in the soil exceeded the applicable RCS-2 standards, and dissolved arsenic and lead in groundwater exceeded the RCGW-2 standard. In January 1997, on behalf of O'Donnell, CES submitted a Phase I ISI and Tier Classification (Phase I report) to MassDEP. The disposal site was classified as a Tier II disposal site. The Phase I report identified arsenic, lead, and low pH as contaminants of concern (COCs). O'Donnell submitted a Phase II Extension Request to MassDEP in February 1999 and sold the property to Mystic Landing, LLC ("Mystic Landing") in 2001.

In 2001, on behalf of Mystic Landing, Rizzo Associates (a predecessor to Tetra Tech Rizzo, Inc. of Framingham, Massachusetts ("Tetra Tech Rizzo")) performed a limited subsurface investigation at the Site, including the collection of soil and groundwater samples. The findings of the subsurface investigation were similar to CES's findings. Between 2005 and 2007, Tetra Tech Rizzo conducted additional subsurface investigations, including the collection and analysis of additional soil, groundwater and sediment samples. The results of these investigations were also generally consistent with those from previous sampling rounds.

In June and July 2007, Williams Environmental, Inc. (Williams) conducted a supplemental subsurface investigation at the Site, including the excavation of 40 test pits and the collection and analysis of soil, groundwater and sediment samples.



As with previous analyses of environmental media conducted at the Site, lead and arsenic were the contaminants detected at the highest concentrations and with the greatest frequency.

In December 2007, on behalf of Mystic Landing, Tetra Tech Rizzo submitted a Phase II Comprehensive Site Assessment (Phase II CSA) and Tier II Extension Request to MassDEP. The Human Health Risk Assessment included in Tetra Tech Rizzo's CSA concluded that there was No Significant Risk (NSR) and No Substantial Hazard associated with the current use of the Site as a construction material storage yard or for similar uses that did not disturb the surficial layer of tunnel muck.

FBT Everett Realty, LLC (FBT) purchased the Site from Mystic Landing in October 2009. On February 11, 2010, GEI Consultants, Inc. (GEI) of Woburn, Massachusetts submitted an Eligible Person Certification and Revised Tier Classification Submittal to MassDEP on behalf of FBT. The disposal site remained a Tier II disposal site based on the Revised Tier Classification Submittal and, pursuant to 310 CMR 40.0570, the deadlines for conducting response actions at the Site were re-established.

In February 2012, GEI submitted a Phase II CSA based only on data previously developed by others because GEI's access to the Site was reportedly denied by the Site occupant at the time. As part of the Phase II CSA, GEI conducted a Method 3 Risk Characterization which concluded that a Condition of NSR to human health existed at the Site for most of the then-current uses of the Site, but that NSR could not be demonstrated for all foreseeable future Site uses.

Because of the delay in obtaining access to the Site, FBT filed a Notification of Delay with MassDEP, requesting that the deadline for the Phase III – Remedial Action Plan (RAP) be extended from February 2013 to June 2013, and that the deadline for the Phase IV – Remedy Implementation Plan (RIP) be extended from February 2014 to June 2014. FBT subsequently filed a second Notification of Delay requesting that the Phase III RAP deadline be further extended to September 2013, and the Phase IV deadline be extended to June 11, 2015.

GEI conducted additional soil and groundwater investigations in December 2012 and March 2013. These investigations included the installation of a series of soil borings and monitoring wells on the land-side portion of the Site, and the collection and analysis of soil and groundwater samples. The results of the additional investigations were generally consistent with those previously documented. GEI also conducted a bench scale evaluation of in-situ solidification/stabilization (ISS) of soils as a remedial alternative for certain areas of the Site. On August 30, 2013, FBT filed a Phase III RAP for the Site outlining the selected Remedial Action Alternatives (RAA). The Phase III RAP identified three areas of concern to be addressed to reach a Permanent Solution under the MCP on the land-side portion of the Site. These areas are referred to as the A-5 Area; CES-3 Area and Low pH Area. The three areas are depicted on Figure 3, and are described below. Additional assessment activities in these three areas conducted by GZA on behalf of Wynn are summarized in Section 3.00.

- A-5 Area: The A-5 area is situated in the northern portion of the Site in the vicinity of previous exploration location A-5, where lead and arsenic concentrations (216,000 and 153,000 mg/kg, respectively) were detected in a soil sample obtained by Williams in 2007 from approximately 8 feet below ground surface. GEI and GZA conducted several rounds of soil sampling in the A-5 area in an attempt to duplicate the original sample and to delineate the impacts in this area. However, both GEI and GZA were unable to duplicate the elevated A-5 results. Arsenic concentrations in the samples collected by GEI and GZA were lower than the initial A-5 analytical results by two orders of magnitude or more, but many were above the Upper Concentration Limit (UCL) of 500 mg/kg. Similarly, lead concentrations in the samples collected by GEI and GZA were lower than the initial A-5 analytical results but many exceeded the UCL of 6,000 mg/kg. No specific source for the elevated arsenic and lead levels has been



identified, and the impacts appear to be related to the fill material in the area. Groundwater samples collected from this area have not indicated concentrations of metals above the applicable Method 1 GW-3 Standards.

- CES-2 Area: The CES 2 area is situated in the northern portion of the peninsula, in the vicinity of previous exploration location CES-2. Arsenic has been detected in both soil and groundwater in this area. The highest concentration of arsenic in soil (9,470 mg/kg) was observed in CES-2-3, while the maximum dissolved concentration of arsenic (114, mg/L) was detected in a groundwater sample from CES-2-2. Unlike the Low pH area (see below), soil and groundwater pH levels in the CES-2 Area are relatively neutral, ranging from 4.74 to 6.82.
- Low pH Area: The Low pH Area includes the southern corner of the peninsula where the pH has been measured to be at or below 4, with the lowest level (pH of 1.63) detected at the southern end in SHORE-9. Dissolved arsenic, cadmium, chromium, lead, nickel and zinc, along with total cyanide, have been detected above the applicable Method 1 GW-3 Standards in the low pH Area, with the concentrations of arsenic, cadmium and lead in groundwater samples from certain wells above their respective UCLs. As indicated in GEI's Phase III report, a plot of dissolved lead concentrations against pH indicates a strong correlation between pH below 4 and dissolved lead concentrations above the UCL.

The remedial alternative selected by GEI for the land-side portion of the Site included the in-situ solidification/stabilization (ISS) of contaminated soil in the Low pH Area and CES-2 Area, and the excavation and off-Site disposal of contaminated soil from the A-5 Area. However, as discussed below, Wynn proposes to excavate and dispose of soil from the CES-2 Area because the more complicated geochemistry of arsenic makes removal a more reliable alternative.

For the water-side portion of the Site, GEI selected "Further Assessment and Monitoring" as the recommended RAA, indicating that this approach would initially result in a Temporary Solution, but that the "remediation planned on the land-side portion of the Site is likely to change conditions on the water-side portion of the Site and this RAA will allow the impact of those changes to be evaluated." However, Wynn has conducted an additional assessment of sediment within the water-side portion of the Site, as summarized in Section 3.00, and will use the results of that sampling to further assess potential remedial alternatives in a forthcoming supplemental Phase III Report.

2.22 Environmental Assessment Conducted by Wynn

On January 2, 2015, Wynn acquired the property on which the disposal site is located. On February 5, 2015, Wynn filed an Eligible Person Submittal and a Revised Tier II Classification with MassDEP for RTN 3-13341 to re-establish response action deadlines in accordance with 310 CMR 40.0570. In response to the Eligible Person Submittal, MassDEP issued a Notice of Responsibility/Establishment of Interim Deadlines for the Site to Wynn on February 24, 2015. The Notice established the following deadlines for Wynn:

1. A supplemental Phase II Report documenting additional assessment completed at the Site, including the assessment of sediment and surface water, and prepared pursuant to 310 CMR 40.0835, must be submitted to MassDEP by December 31, 2015;
2. If applicable, a supplemental Phase III Remedial Action Plan prepared pursuant to 310 CMR 40.0861, and a Phase IV Remedy Implementation Plan prepared pursuant to 310 CMR 40.0874, must be submitted to MassDEP by June 30, 2016; and



3. A Permanent Solution Statement or a Temporary Solution Statement pursuant to 310 CMR 40.1000, or a Remedy Operation Status Submittal pursuant to 310 CMR 40.0893, must be submitted to MassDEP by December 31, 2017.

The following sections summarize recent subsurface assessment activities conducted at the Site by GZA on behalf of Wynn.

- Land-Side Assessment Activities: Several rounds of subsurface assessment activities have been conducted on the land-side portion of the Site to assess the extent of contamination in support of future MCP response actions. The objective of these activities was to further assess the extent of the three remediation areas. In addition to the assessment activities described below, GZA completed a series of soil borings for the purpose of precharacterizing soils that may require off-site disposal as part of future construction activities. Where appropriate, analytical results developed as part of the precharacterization program have been used to supplement MCP investigations. Land-side subsurface assessment activities conducted in each of the three targeted remediation areas are discussed below. Further details and the results of the investigations are provided in the August 18, 2015, RAM Plan for pre-construction remediation.

A-5 Area: Twelve soil borings were installed to further assess the areal extent of lead and arsenic impacts in soil. Borings were installed to depths up to 12 feet below ground surface (bgs). Soil samples were obtained at approximately 2-foot intervals throughout the borings, and 72 samples were submitted for laboratory analysis for lead and arsenic.

CES-2 Area: On January 23, 2015, constant head hydraulic conductivity testing was performed in two existing monitoring wells (CES-2-1 and CES-2-2) within the CES-2 Area, and in one well immediately outside of the CES-2 Area (BOR-109-3), to characterize the hydrogeologic properties of the shallow soils and to support groundwater flow calculations in preparation for dewatering of the area during remediation.

Low pH Area: Fourteen additional monitoring wells were installed to further assess the extent of the Low pH Area in the southern peninsula. Boring locations were selected outside of the proposed GEI treatment area to assess the extent of groundwater with a pH of 4 or less. Groundwater samples from the wells were field screened for pH, and submitted for laboratory analysis for dissolved RCRA 8 metals and pH.

- Water-Side Assessment Activities: GZA completed two sediment sampling programs to further assess the extent of contamination associated with the Site within the Mystic River. Combined, a total of 96 sediment cores were advanced to further characterize the extent of contamination at the Site, and 252 individual samples were submitted for laboratory analysis. During each sampling event, sediment samples were collected from varying depths using a small boat, a vibra-core rig and a mini-ponar dredge. Samples were submitted to ESS Laboratory for analysis for metals, polycyclic aromatic hydrocarbons (PAHs), total organic carbon (TOC), SVOCs, VOCs, PCBs, EPH, reactive cyanide and sulfide and/or grain size distribution. In addition, certain surficial samples were transported to New England Bioassay, of Manchester, Connecticut, for 28-day whole sediment toxicity testing using the amphipod *Leptocheirus plumulosus*.

Between May 20 and 21, 2015, GZA collected a round of surface water samples. During low tide, GZA assessed the Site for visible seeps of groundwater discharging to the intertidal zone in small rivulets leading to the Mystic River. Two such seeps were identified and sampled. In addition, surface water samples were collected from the shore at low tide to represent "worst case" surface water conditions within the groundwater-to-surface water mixing zone. Samples were submitted to ESS Laboratory for analysis for metals, PAHs, EPH and SVOCs. In addition, the following parameters were measured in the field at each sample location: pH, dissolved oxygen, conductivity and turbidity.



The results of these studies were presented in a draft, Supplemental Phase II report which was presented for public review and comment at a February 1, 2016, meeting.

2.23 Ongoing Remediation Activities

Pre-construction remediation activities are being conducted under the August 18, 2015, RAM Plan are nearing completion as of the date of this document. The objectives of this initial RAM were the removal and/or treatment of potential source material, the reduction of average soil and groundwater concentrations of certain contaminants, and the reduction of potential risks to future construction workers. These are generally consistent with the selected RAAs in the Phase III report previously submitted for the Site. The pre-construction RAM activities are expected to be completed in late February or early March of 2016.

2.30 PLANNED FUTURE SITE ACTIVITIES

Further land-side response actions associated with the construction of the Wynn Resort in Everett will be conducted as a second RAM. The evaluation of response actions for the waterside portion of the disposal site, and the selection and implementation of a response action, will be the subject of a supplemental Phase III Report, and, as necessary, a Phase IV Remedy Implementation Plan.

The following sections provide additional information concerning planned future Site activities with respect to the MCP. Applicable reports will be submitted in draft form for public review and comment as required under 310 CMR 40.1405(6)(e).

2.31 Construction-Related RAM Activities

A separate RAM Plan has been prepared address construction-related RAM activities. Response actions to be conducted under this RAM Plan will include the excavation of contaminated soil, the dredging of contaminated sediment, and the placement of clean fill materials at the properties identified in the Plan. As required by the MCP, the Plan provides for the appropriate management and disposal of remediation waste and remedial wastewater generated during construction activities, and describes the implementation of health and safety procedures to protect on-site workers and off-site residents. Further, because the RAM activities are associated with the construction of a structure, this RAM Plan also includes the findings of a focused site assessment, risk characterization and feasibility evaluation to support the eventual filing of a Permanent Solution with Conditions for the Former Everett Staging Yard disposal site. A draft of this RAM Plan will be submitted for public comment concurrently with this revised PIP Plan, and an overview of the RAM Plan will be presented at the February 17, 2016, public meeting.

Best Management Practices (BMPs) will be implemented throughout the RAM. These include the installation and maintenance of erosion and sedimentation controls in the upland areas and turbidity barriers around in-water work areas; measures to monitor and control odors and dust; stockpile management procedures; and decontamination of vehicles leaving the Site. However, despite these BMPs, the potential exists for spills that may require notification to MassDEP. In addition, given the long industrial history of the Site, there is also a potential for discovering previously unknown historical releases that may trigger notification criteria under the MCP. Such notifications will be made promptly and in accordance with the requirements of the MCP and any Site-specific permits.

The 2-hour and 72-hour notification provisions of the MCP also require the prompt implementation of Immediate Response Actions (IRAs), which must be conducted in accordance with an IRA Plan approved by MassDEP. An IRA Plan



describing the actions that will be implemented if certain common IRA conditions are encountered during the implementation of the RAM is included as an appendix to the RAM Plan for public review and comment. This IRA Plan has been developed to be protective of public health and the environment, and to comply with the public involvement requirements of the MCP, while not creating unnecessary delays to an on-going construction project. If IRA conditions (i.e., conditions requiring 2-hour or 72-hour notification pursuant to Section 40.0300 of the MCP) are encountered during construction, MCP response actions will proceed in accordance with this plan. In general, the IRA Plan calls for: 1) oral notification to MassDEP within the appropriate timeframe; 2) obtaining oral approval from MassDEP for addressing the IRA condition during on-going construction activities; 3) written notification to parties on the PIP distribution list of the IRA condition and the response actions begin taken; and 4) if requested, a public meeting under the provisions of the PIP for the Site in conjunction with the filing of an IRA Completion Report.

2.33 Sediment Assessment And Potential Remediation

The results of the sediment and surface water sampling programs discussed above will be used to prepare and file a supplemental Phase III Remedial Action Plan, which will evaluate the feasibility of achieving a Permanent Solution for the water-side portion of the Site. Based on the initial results of the additional evaluation, sediment remediation will likely involve the removal of the upper portion (one to two feet) of contaminated sediment from all or a select area of the water portion of the disposal site, followed by the replacement of this material with a layer of clean fill. Sediment remediation activities would likely be integrated into the final design and construction of Project waterfront improvements, and would be completed under a Phase IV Remedy Implementation Plan to be filed under the MCP.

2.40 PUBLIC INVOLVEMENT HISTORY

On April 8, 2015, Wynn received a petition from residents of the City of Everett requesting that the Site be designated a PIP site in accordance with M.G.L. c. 21E. On April 28, 2015, Wynn formally responded to the petition, designating the Site as a PIP site, and began to develop a draft PIP and conduct public involvement activities at the Site.

In developing this PIP, GZA and Wynn conducted interviews in May 2015 with key officials and individuals interested in the Site. Concerns identified are presented in Exhibit II.

3.00 ADDRESSING PUBLIC CONCERNS

The process for assessing and cleaning up disposal sites, as set forth in the Massachusetts Contingency Plan (310 CMR 40.0000), is designed to address the effects of a site on health, safety, public welfare, and the environment. Once a release of oil or hazardous materials has been confirmed at a disposal site (Phase I of the remedial response action process), the process proceeds to:

- Comprehensive field investigation of the nature and extent of the contamination, and an evaluation of any risks posed to the public and the environment from the Site (Phase II);
- Identification and evaluation of remedial response action alternatives and selection of feasible measures that will achieve a permanent cleanup at the Site (Phase III); and
- Implementation of the selected remedial response actions (Phase IV).



Physical work at a disposal site includes sampling and other environmental field testing, and the implementation of the selected response actions. It may also include the implementation of measures designed to stabilize conditions at the Site to prevent the continued migration of contaminants, or to eliminate an imminent threat to public health, safety, welfare or the environment until planning for a remedial response is underway.

At each step of the remedial response action process, plans for work are developed, the work is conducted, and reports describing results and recommendations for the next step are prepared. The documents which describe each of these steps are the cornerstone of the remedial response action planning process, since they provide the information necessary to make decisions about how a site should be cleaned up.

As noted in Exhibit II, the public has raised a number of concerns about the disposal site. The remedial response action planning process is designed to address the concerns about the nature and extent of contamination; risks posed by the Site to health, safety, public welfare, and the environment; and the adequacy of proposed cleanup measures. These concerns are primarily addressed in Phases II and III of this process. For example, the assessment of off-site contamination is considered in Phase II, as is the impact of the disposal site on public health and the environment. Phase III addresses the adequacy of proposed remedial response actions to provide permanent solutions, in compliance with the requirements of the MCP, for the contamination problems at this Site.

4.00 PUBLIC INVOLVEMENT ACTIVITIES

In accordance with the MCP, activities undertaken to involve the public in response actions serve two purposes:

- to inform the public about the risks posed by the disposal site, the status of remedial response actions, and the opportunities for public involvement; and
- to solicit the concerns of the public about the disposal site and remedial response actions so that, to the extent possible, these concerns can be addressed and incorporated in planning remedial response actions.

To meet each of these objectives, Wynn proposes to undertake specific activities during the remedial response process at the disposal site. These activities are described below.

4.10 INFORMING THE PUBLIC

Wynn will provide Site-specific information to the public by establishing information repositories; developing and maintaining a Site mailing list to distribute information about the Site; and providing advance notification to local officials and residents about Site activities.

4.11 Information Repositories

Publicly Available Site Files: A file on the disposal site is maintained at the Northeast Regional MassDEP Office. The file will contain all MCP documentation pertaining to the Site with the exception of any enforcement-sensitive material. Appointments to view the Site files can be made by contacting the MassDEP Northeast Regional File Review office at 205B Lowell Street, Wilmington, Massachusetts 01887, (978) 694-3320, or online or by fax/phone by following instructions available at the following website: www.mass.gov/eea/agencies/massdep/about/contacts/northeast-region.html. Alternatively, files can be viewed online by searching for RTN 3-13341 using MassDEP's on-line file viewer: <http://public.dep.state.ma.us/SearchableSites2/Search.aspx>.



Local Information Repositories: Wynn will maintain three local information repositories to provide residents with easy access to information about the Site cleanup process and the results of Site investigations. The Site information repositories will contain complete copies of the MassDEP site file since PIP designation, including the Public Involvement Plan Interim Guidance for Waiver Sites¹; work plans; sampling and field testing plans; technical reports and documents summarizing results and recommendations; relevant correspondence; press releases; public information materials; the PIP; public meeting summaries; summaries of responses to comments received; and copies of public notices about the disposal site. Information will be sent to the repository by Wynn as it is developed.

The information repositories for the (Former) Everett Staging Yard disposal site are located at:

Parlin Memorial Library
410 Broadway
Everett, MA 02149
617-394-2300,
Monday-Thursday 9 a.m. to 9 p.m.
Friday and Saturday 9 a.m. to 7 p.m.

Shute Memorial Library
781 Broadway
Everett, MA 02149
617-394-2308
Monday, Wednesday and Friday 10 a.m. to 5 p.m.
Tuesday and Thursday 11 a.m. to 7 p.m.

Boston Public Library
Charlestown Branch
179 Main Street
Charlestown, MA 02129
617-242-1248
Monday and Thursday 12 p.m. to 8 p.m.
Tuesday and Wednesday 10 a.m. to 6 p.m.
Friday 9 a.m. to 5 p.m.
Saturday 9 a.m. to 2 p.m.

Somerville Public Library
79 Highland Avenue
Somerville, MA 02143
617-623-5000
Monday-Thursday 9 a.m. to 9 p.m.
Saturday 9 a.m. to 5 p.m.

¹ GZA notes that inclusion of the referenced guidance is a MassDEP requirement; however, the guidance predates the current MCP, and thus contains language and references no longer applicable to the MCP or PIP process.



Additionally, public comment documents and final submitted versions of MCP documents can be viewed on the following website: www.wynnineverett.com/public_documents.html.

4.12 Site Mailing List

A mailing list has been established for the disposal site. The Site mailing list will include all individuals who ask to receive information about the disposal site; it also includes the Mayors of Everett, Somerville, and Boston, the Everett and Somerville Boards of Health, the Boston Public Health Commission, MassDEP², and the Everett, Somerville and Boston Conservation Commissions. The mailing list will be used to announce upcoming public meetings, distribute fact sheets, provide notice of public comment periods on and the availability of documents in the information repositories, and any other relevant information about the disposal site. GZA will maintain the mailing list and update it as necessary. The current mailing list is included as Exhibit III.

Anyone wishing to be added to the mailing list can call or write to: David E. Leone at GZA GeoEnvironmental, 249 Vanderbilt Avenue, Norwood, Massachusetts 02062, or via email at davide.leone@gza.com. Please specify whether you would like to receive notices by email, USPS, or both, and provide the appropriate contact information.

4.13 Notification to Local Officials and Residents of Major Milestones and Events

The MCP requires community notification of major planning and implementation milestones at disposal sites. Major milestones include:

- Start of field work involving:
 - Implementation of any Immediate Response Action for an Imminent Hazard
 - Implementation of any RAM
 - Use of a respirator or Level A, B or C protective clothing
 - Residential sampling
 - Phase IV Remedial Activities
- Completion of each phase:
 - Phase Reports
 - Immediate Response Action Completion Statements
 - Permanent or Temporary Solution Statements
 - Activity and Use Limitations (deed restriction)
 - Downgradient Property Status Opinions

Notification of field work will include information on the type of work and its approximate duration. Notification will be made by Wynn to the people on the Notification List by email or telephone the day before activity is scheduled to begin. Notification at the end of a remedial phase will include a summary of the phase report and information on where the report can be reviewed. Those to be notified include:

² Consistent with 310 CMR 40.1405(6)(j)



Name	Affiliation	Address, Phone & Email
Evmorphia Stratis	Lead Petitioner	43 Corey Street Everett, MA 02149 (617) 232-4211 evmorphia@gmail.com
Carlo de Maria, Jr.	Mayor of Everett	City Hall 484 Broadway Everett, MA 02149 (617) 394-2270 mayorcarlo.demaria@ci.everett.ma.us
David Rodrigues	Assistant City Solicitor, City of Everett	City Hall 484 Broadway Everett, MA 02149 (617) 394-2230 david.rodrigues@ci.everett.ma.us
Alba Cruz-Davis	Acting Director, Everett Health Department	City Hall 484 Broadway, Room 20 Everett, MA 02149 (617) 394-2255 alba.cruzdavis@ci.everett.ma.us
Michael Gove	Environmental and Sustainability Planner, City of Everett	City Hall 484 Broadway Everett, MA 02149 (617) 394-2334 michael.gove@ci.everett.ma.us
Joseph W. McGonagle	State Representative	State House, Room 134 Boston, MA 02133 (617) 722-2400 joseph.mcgonagle@mahouse.gov
Sal N. DiDomenico	State Senator	State House, Room 208 Boston, MA 02133 (617) 722-1650 Sal.DiDomenico@masenate.gov
Chief David T. Butler	Everett Fire Department	Everett Fire Department 384 Broadway Everett, MA 02149 (617) 387-7198 david.butler@cityofeverett.gov
Chief Steven A. Mazzei	Everett Police Department	Everett Police Headquarters 45 Elm Street Everett, MA 02149 (617) 394-2120 steven.mazzei@cityofeverett.org



Martin J. Walsh	Mayor of Boston	Boston City Hall 1 City Hall Square, Suite 500 Boston, MA 02201 (617) 635-4500 mayor@boston.gov
Dr. Huy Nguyen	Director, Boston Public Health Commission	Boston Public Health Commission 1010 Massachusetts Avenue Boston, MA 02201 (617) 534-5395 hnguyen@bphc.org
Charlotte Moffat	Executive Secretary, Boston Conservation Commission	Boston City Hall, Room 709 1 City Hall Plaza Boston, MA 02201 charlotte.moffat@boston.gov
Joseph A. Curtatone	Mayor of Somerville	Somerville City Hall 93 Highland Avenue Somerville, MA 02143 (617) 625-6600 x2100 mayor@somervillema.gov
Francis X. Wright, Jr.	Somerville City Solicitor	Somerville City Hall 93 Highland Avenue Somerville, MA 02143 (617) 625-6600 x4400 law@somervillema.gov
Oliver Sellers-Garcia	Somerville Director of Sustainability and Environment	Somerville City Hall 93 Highland Avenue Somerville, MA 02143 (617) 666-3311 ogarcia@somervillema.gov

In addition, the Everett Fire and Police Departments will be notified in situations where public safety is a concern. Further, a project information station will be created at the perimeter of the Site to provide emergency contact information.

4.20 SOLICITING PUBLIC INPUT

Wynn will provide opportunities for public input regarding Site cleanup decisions by holding public comment periods to provide additional opportunities for oral and written input regarding Site cleanup decisions, and preparing summaries of all comments received during the public comment period and responses to them.

4.21 Public Comment Periods

Wynn will provide specific opportunities for the public to submit comments about documents concerning the Site. When key documents are available in draft form, they will be provided to the information repositories, and a notice of their availability will be sent to the Site mailing list. The notice will include the title of the document, where it is available for review, information about how to submit comments to Wynn, and the length of the public comment period. Wynn will determine the length of the comment period, which will normally be 20 calendar days, but may be longer if warranted by the complexity of a particular document, or unless extended at the request of the public for a minimum of an additional twenty (20) days. Time critical elements of an Immediate Response Action Plan may be conducted prior to the close of



the public comment period if delaying the remedial actions would exacerbate a release or Site conditions, or would endanger health. Wynn will be responsible for providing document copies to the information repositories and to the MassDEP site file, as well as sending out notices of availability of any documents it prepares.

Documents that will be available for public comment are currently anticipated to include:

- PIP Plan;
- RAM Plans and Completion Statements;
- IRA documentation;
- Phase II, III and IV reports for the water-side portion of the Site; and
- Temporary and/or Permanent Solution Statements and supporting documentation, including an AUL.

As previously noted, an IRA Plan addressing construction-related activities has been included for public comment in the RAM Plan. If one or more of the IRA conditions included in the IRA Plan are encountered during construction, MassDEP will be notified within the appropriate timeframe, and GZA will begin IRA activities as presented in the plan and as orally approved by MassDEP without an additional public comment period. After IRA activities have been completed, an IRA Completion Statement will be available for public comment. If conditions are encountered which are outside the scope of the IRA Plan included in the RAM, a separate IRA Plan will be prepared and presented for public comment.

4.22 Response to Comments

Wynn will prepare a summary of all comments received on each document available for public comment, and responses to these comments. A copy of this response summary will be sent to all those who submitted comments, and copies will also be placed in the information repositories and the MassDEP site file. Wynn will also send a notice of availability of the response summary to the mailing list. The summary will be made available prior to Wynn taking the remedial response action submitted for comment, or prior to moving to the next MCP phase.

4.23 Public Meetings

Wynn will brief the public about the status of the (Former) Everett Staging Yard disposal site during the remedial action process. Meetings will take place at the following milestones:

- Submittal of Draft RAM Plans and Completion Statements;
- Submittal of Draft Phase II, III and IV reports for the water-side portion of the Site; and
- Submittal of Draft Temporary and/or Permanent Solution Statements and supporting documentation, including an AUL.

As previously noted, an IRA Plan has been included for public comment in the RAM Plan addressing construction-related activities. A discussion of this IRA Plan was included in the public meeting on February 17, 2016. If one or more of the conditions included in the IRA Plan are encountered during construction, MassDEP will be notified within the appropriate timeframe, and GZA will begin IRA activities as presented in the plan and as orally approved by MassDEP without an additional public meeting. After IRA activities have been completed, an IRA Completion Statement will be available for public comment. If requested, a public meeting will be held in conjunction with the filing of an IRA Completion Report. If a meeting is not requested, information concerning the IRA activities will be presented at the public meeting to be held for the RAM Completion Report.



Meetings will serve two purposes: 1) to provide community officials and the general public with a progress report regarding remedial response actions at the Site, and 2) to provide an opportunity for the public to question and comment on remedial action plans for the Site. Wynn will attempt to provide draft reports 3 days in advance of these meetings, and notice of public meetings at least 14 days in advance.

Wynn will send notices announcing public meetings to individuals on the Site mailing list. Wynn will prepare meeting summaries, submit the summaries to MassDEP, and place a copy of the summaries in the local information repository.

5.00 SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES

Exhibit IV provides a schedule of the public involvement activities listed in Section 4.00. The schedule specifies the milestones during the remedial response actions when public involvement activities will be conducted.

6.00 RESPONSIBILITY FOR IMPLEMENTING THE PUBLIC INVOLVEMENT PLAN

Wynn has developed this PIP and is responsible for carrying out the activities listed in this PIP during the Site cleanup process. To ensure that Public Involvement Plans are implemented properly, MassDEP has established the appeal process described in the Interim Guidance for handling disputes about public involvement activities. The appeal process is initiated when ten or more residents of the community in which the Site is located or of a community potentially affected by the Site submit a signed petition to Wynn and to MassDEP stating that Wynn is not implementing activities agreed upon in the final PIP. The petition must provide specific information documenting Wynn's failure to implement specific sections of the PIP.

Upon receipt of the appeal petition, Wynn must provide written confirmation of receipt to the petitioners and provide a copy of the petition to MassDEP. Wynn then has twenty (20) calendar days to work with the petitioners to address their concerns. Within this 20-day period, Wynn must respond to the petition in writing, describing how each issue identified by the petition will be addressed. Any resulting changes in public involvement activities must be incorporated into the PIP. A 20-day public comment period must then be held on the revised PIP, in accordance with Section 7.00 of this PIP. Any revisions to the PIP or specific responses to the appeal petition must be provided to MassDEP.

If Wynn and the petitioners cannot resolve the petitioners' concerns within 20 calendar days, the petitioners must each submit written information to MassDEP documenting their concerns, actions taken to date to resolve the issues, and their inability to resolve the issues independently of MassDEP. When MassDEP receives this information, it will take the following actions:

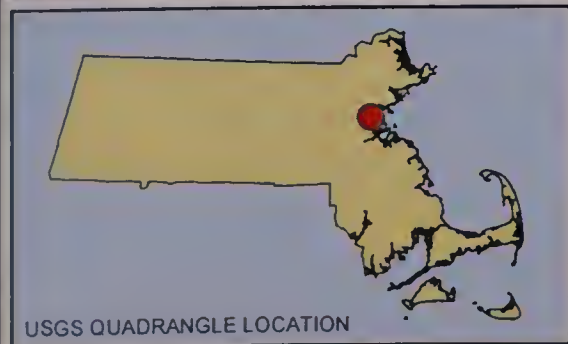
1. Review the information Packages to assess specific petitioner complaints, identify other community concerns, and determine what public involvement activities, as specified in the PIP, have and have not been conducted. MassDEP may inspect local information repositories, review notification letters, and contact members of the Notification List.
2. Determine whether Wynn has made any efforts to address community issues. This may include a review of meeting summaries, correspondence or other formal attempts to resolve community concerns about insufficiencies in public involvement activities. If, based upon review of the appeal petition, MassDEP determines that the PIP is not being implemented, MassDEP may take one or more of the following actions:



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FIGURES

© 2014 - GZA GeoEnvironmental, Inc., J:\170,000-179,999\171521\171521-05.DEL\FIGURES\GIS\MXDs\171521-05_LocusPlan_1HorizonWayEverett_FIG1.mxd, 10/14/2014, 1:00:54 PM, Elaine.donohue



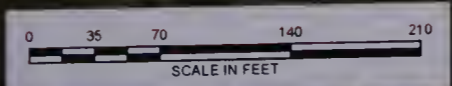
SOURCE : THIS MAP CONTAINS THE ESRI ARCGIS ONLINE USA TOPOGRAPHIC MAP SERVICE, PUBLISHED DECEMBER 12, 2009 BY ESRI ARCGIS SERVICES AND UPDATED AS NEEDED. THIS SERVICE USES UNIFORM NATIONALLY RECOGNIZED DATUM AND CARTOGRAPHY STANDARDS AND A VARIETY OF AVAILABLE SOURCES FROM SEVERAL DATA PROVIDERS.



	PROJ. MGR.: DEL DESIGNED BY: DEL REVIEWED BY: LF OPERATOR: EMD DATE: 10-14-2014	<h1>LOCUS PLAN</h1> <h2>1 HORIZON WAY EVERETT, MASSACHUSETTS</h2>	JOB NO. 01.0171521.05 FIGURE NO. 1
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© 2015, GZA GeoEnvironmental, Inc. J:\170,000-179,999\17521-00\DELIFIGURES\GIMX\Del17521_ExplorationLocationPlan.mxd 8/1/2015, 4:00:25 PM, stephen wehburn



LEGEND			
PARCEL BOUNDARY			
- - - - - APPROXIMATE PARCEL BOUNDARY			
GZA EXPLORATIONS			
	ENVIRONMENTAL BORING		PRECHARACTERIZATION SOIL BORING
	ENVIRONMENTAL MONITORING WELL		STOCKPILE SOIL SAMPLE
	GEOTECHNICAL BORING		SEDIMENT CORING LOCATION
GZA EXPLORATIONS (CONTINUED)			
	GEOTECHNICAL MONITORING WELL		GEI BORING
	PRECHARACTERIZATION SOIL BORING		GEI TEMPORARY WELL
	STOCKPILE SOIL SAMPLE		GEI TEST PIT
	SEDIMENT CORING LOCATION		GEI WELL
GEI EXPLORATIONS			
HISTORICAL EXPLORATIONS			
	HISTORIC BORING		HISTORIC TEST PIT
	HISTORIC SURFACE SOIL SAMPLE		HISTORIC WELL

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WYNN EVERETT
EVERETT, MA

EXPLORATION LOCATION PLAN

PREPARED BY: GZA GeoEnvironmental, Inc.
Engineers and Scientists
www.gza.com

PROJ MGR	DEL	REVIEWED BY	DEL	CHECKED BY	DEL	FIGURE
DESIGNED BY	DEL	DRAWN BY	SMW	SCALE	1 INCH = 70 FT	2
DATE	06-01-2015	PROJECT NO	01 0171521 10	REVISION NO		



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EXHIBIT I

RESPONSE TO COMMENTS

Commenters	
Comment Code	Entity or Individual
Maharjan	Buddha Maharjan, 7 Scott Place, Everett, MA 02149
Levesque	Lynn C. Levesque, Charlestown, MA 02129
Somerville	City of Somerville, Massachusetts (Joseph Curtatone, Mayor)
Kelleher	Ann Kelleher, joy02129@gmail.com
M&E	McCarter & English, 265 Franklin Street, Boston, MA 02110-3113, Leigh A. Gilligan, Partner
Comments Received on Draft Public Involvement Plan and/or Release Abatement Measure Plan as of July 13, 2015	
Maharjan-1	<p>In meeting, you said the truck will not use the route 99, any city road, Sullivan square, and Costco road. I am curious, what roads are they using because there are no other roads than I mention above? Or are you making any skyway overfly ramp for the truck? We want to know about it in details before you start the work.</p> <p>Response: During the June 2, 2015 meeting, it was stated that local roads (e.g., Main Street, Bunker Hill Street and Medford Street in Charlestown) would not be used. The actual routes for trucks hauling soil will be dictated in part by the eventual disposal location for the soil; however, Wynn will limit the truck drivers to main roads, such as Route 99, as direct routes to Route 93.</p>
Maharjan-2	<p>We live just across the site. When they will dig the soil, how long do the bad smell spread on the air? In meeting, you didn't mention any range of distance. You just mentioned about the alarm. But we want to know the factual data that the harm air can harm the people. Before the work, we want to know the factual researched data that people are safe/unsafe in certain distance of the working site.</p> <p>Response: No significant odors are anticipated during the remediation described in the RAM Plan. The perimeter air monitoring system discussed during the June 2, 2015, meeting, and described more fully in the RAM Plan, is designed to provide an alert before unacceptable levels of dust are generated, thereby allowing appropriate and timely dust mitigation measures. The dust action levels for the site were derived using a combination of site-specific soil analytical data and published National Ambient Air Quality Standards and Massachusetts Ambient Air Quality Standards. Details concerning the derivation of the action levels are further described and presented in the RAM Plan.</p>
Maharjan-3	<p>What hours will they work? We don't want any disturbance at night.</p> <p>Response: Hours of operation for the pre-construction remediation described in the RAM Plan are anticipated to be from 7:00 AM to 5:00 PM, Monday through Friday.</p>

Levesque-1	<p>I note that one of the concerns voiced during your interviews with the petitioners was their ability to adequately understand the issues around Wynn’s remediation of the Mystic River site. “Interviewees expressed an interest in having discussions about the remedial response action process expressed in layman’s terms.” I second this concern and request that you address this concern in the future. I attended the June 2 meeting and frankly did not find it all that helpful toward a better understanding of the issues around the site. Your plan also does not address that concern. Both the presentation and the plan shroud many of the issues in very technical jargon. Future communications should be in clear layman English to further everyone’s full understanding. Perhaps an “executive summary” highlighting key points, dates, and contact information would be helpful?</p> <p>Response: Future technical MCP submittals will contain an executive summary or conclusions section.</p>
Levesque-2	<p>The PIP process opens up your planning process to the public for sharing information and garnering input. Since so much of the traffic transporting the contaminants out of the Mystic site will be going through Sullivan Square and thus impact Charlestown/Boston residents – as duly noted by Chris Gordon at the June 2nd meeting, I would expect in the future that there would be much more communication to the Charlestown community regarding the documents available to them and dates of future meetings and comment periods. Notices in the Charlestown Patriot Bridge at least a week before a meeting would also be most appropriate.</p> <p>Response: As discussed at several meetings, Wynn will hold future meetings in various communities, including Charlestown, to keep the community informed about the project and remediation, and to answer questions. As has been done in the past, milestone public meetings will be publicly advertised to ensure proper notice.</p>
Levesque-3	<p>As part of this openness, I would suggest that in the future you provide information in advance (2-3 days at least) of a meeting so that attendees can digest the material prior to attending and thus be more conversant with the issues.</p> <p>Response: GZ A and Wynn will attempt to provide information for future meetings 3 days in advance.</p>
Levesque-4	<p>Also in the future, when deadlines have been extended, as they have in this case, emails to those signing up at the meeting would appear to be most appropriate. It is unclear to me why this extension was not widely communicated.</p> <p>Response: The decision to extend the public comment period was reached at the request of the attorney representing the PIP Petitioners. The noted</p>

	<p>deadlines were changed in the online repository, and notifications were made to those people who had signed up for the mailing list. Those who had requested correspondence via email received the notice electronically; those for whom we only have mailing addresses, or who had requested correspondence via USPS, received the information via the USPS.</p>
Levesque-5	<p>While I am not conversant with the technical aspects of the plan, I would like to know if there has been any sort of independent analysis of the site, by qualified experts not paid by Wynn, that confirms your plan for remediation. For example, you note that there are only three “hot spots” that need to be cleaned up prior to construction. Would an independent environmental engineering firm confirm that conclusion?</p> <p>Response: The remedial action alternatives outlined in the Phase III – Remedial Action Plan were first developed by GEI Consultants, Inc. for the prior owner of the Site. The selected alternatives were reviewed and supplemented by GZA. Wynn and GZA met with representatives of the MassDEP Bureau of Waste Site Cleanup to discuss the proposed landside remediation of the disposal site, and the draft RAM Plan addresses initial comments offered by MassDEP. In addition, the Gaming Commission has retained its own consultants to monitor activities at the site. Finally, we understand that an independent Licensed Site Professional has also been retained by the PIP petitioners to review GZA’s work.</p>
Somerville-1	<p>Somerville officials, including the Mayor, the City Solicitor, and the Director of Sustainability and Environment, all at City Hall, 93 Highland Avenue, Somerville, MA 02143, should be added to the “site mailing list” and to the Notification to Local Officials and Residents of Major Milestones and Events list in the Public Involvement Plan.</p> <p>Response: The noted entities have been added to the mailing/notification lists.</p>
Somerville-2	<p>The Somerville Public Library, 79 Highland Avenue, Somerville, MA 02143, should be added as an additional Local Information Repository for all documents.</p> <p>Response: The Somerville Public Library will be added.</p>
Somerville-3	<p>Information about any planned response actions which may impact any portion of waters or land within Somerville’s boundaries should be provided, and clearly demarcated on plans, to Somerville and the public. All information regarding proposed routing of contaminated soil or materials should be provided to Somerville officials.</p> <p>Response: No MCP response actions associated with the disposal site are anticipated to occur within the boundaries of Somerville; however, should response actions extend into Somerville, the requested information will be provided. Routing of contaminated soil or materials through Somerville, with the exception of potential transportation via a short section of Route 38 to Interstate 93, is not anticipated.</p>

Somerville-4	<p>Somerville believes it is appropriate and necessary for an independent licensed site professional to review the remedial action plan (RAM Plan) and any further remediation plans.</p> <p>Response: See Levesque-5</p>
Somerville-5	<p>More than half of the land area containing over half the population of Somerville meets one or more of the Environmental Justice (EJ) population descriptors in the 2002 EJ Policy. Many of these block groups are within a mile of the Wynn Everett site, as are similar EJ populations in Everett and other surrounding communities. Whether or not required by the EJ Policy, enhanced public participation, as set forth in that policy, should have been met in the circulation and review of the Plan, the RAM Plan, and should be met for all steps going forward. Without this enhanced public participation, the public involvement plan falls short of the standard for true public involvement and will instead disenfranchise many of the residents most affected by the proposed activities, including the transport of contaminated soils.</p> <p>The EJ Policy indicates that: Enhanced public participation may include use of alternative media outlets such as community or ethnic newspapers, use of alternative information repositories, and translation of materials or interpretation services at public meetings where the relevant EJ Population uses a primary language other than English in the home.</p> <p>As many of these EJ populations are found along the I-93 corridor and other major access routes to Wynn Everett, such outreach should be required. The Plan's distribution list should include alternative media outlets, placement in alternative information repositories, and announcements or summaries in Spanish, Greek, Haitian Creole, Italian, Portuguese, all of which are languages used by Somerville's EJ communities, as well as to SomerViva, http://somervillema.gov/somerviva, the City of Somerville's immigrant outreach program.</p> <p>Response: The PIP Plan was developed in accordance with applicable regulations (310 CMR 40.0000) and guidance (MassDEP Interim Policy WSC-800-90). As noted in the comment, the enhanced public participation components of the EJ Policy are not applicable to remediation sites. Furthermore, a review of published EJ maps indicates that the disposal site is not located within, or within approximately ½ mile of, any community exhibiting English isolation. As such, these enhanced public participation activities are not warranted for the planned MCP response actions.</p>
Somerville-6 via Lightship Engineering, LLC	<p>What method will be utilized to conduct the <i>in-situ</i> solidification and stabilization ("ISS") in the Low pH area? ISS is proposed to be conducted to 15 feet below grade. Does the soil mixing method/ISS result in the potential for the migration of "remedial additives" beneath the sheet pile wall (20 ft. below grade) to the Coastal Bank or into the Mystic River? If so, what monitoring will be conducted</p>

	<p>to assess if this is the case?</p> <p>Response: The specific method used to conduct ISS in the Low pH Area will be dependent on the selected remediation contractor; however, bucket mixing is anticipated. The sheet pile wall will extend to approximately 20 feet below grade, while ISS will extend to approximately 15 feet below grade, allowing for an approximately 5-foot buffer zone of soil, greatly limiting the potential for migration of remedial additives beneath the sheet pile wall. Visual monitoring will be conducted to assess the potential for migration of additives to the Coastal Bank or into the Mystic River.</p>
<p>Somerville-7</p> <p>via Lightship Engineering, LLC</p>	<p>The RAM indicates that "visual observations of both the Mystic River and the Coastal Bank outside of the sheet pile wall will be conducted on a daily basis during ISS implementation to assess for the breakout of remedial additives." How often will visual observations be made during the day? What visual observations will indicate breakout? In the event of visual evidence that is assumed to consist of water or fluid breakout at the Coastal Bank, what field monitoring and/or instruments will be utilized to assess pH, metals/oil and/or hazardous materials ("OHM") in the fluids discharged to the Coastal Bank or Mystic River? Is there a contingency plan to address breakout if it occurs?</p> <p>Response: Visual observations will be conducted as often as practical, but at a minimum at the start and end of each work day when ISS is being performed. Visual observations indicating breakout include seeps of soil/Portland cement mixes, sloughing of soils, or cloudy/discolored plumes emanating from the shoreline. It is expected that field monitoring in the event of breakout will be limited to visual observation; however, the use of a field pH meter and collection of surface water samples for laboratory analysis will be conducted as necessary. In the unlikely event of breakout, a silt curtain and/or other damming/isolation procedure will be utilized to limit impacts to the resource areas and assess the location from which such breakout is occurring. Procedures to isolate/block migration from inside of the sheet pile wall would also be implemented.</p>
<p>Somerville-8</p> <p>via Lightship Engineering, LLC</p>	<p>The upper 4 feet of soils located within the Low pH area will be excavated and placed back into the Low pH Area upon completion of ISS. What is the pH and concentration of metals/OHM in these soils (0 to 4 feet)? Will the placement of these soils back into this area result in a continued infiltration of metals/OHM to the subsurface soils or groundwater and/or the migration of metals/OHM particulates in surface water runoff to the Mystic River?</p> <p>Response: Concentrations of metals/OHM in these soils are generally lower than those encountered in deeper soils. Much of the upper 4 feet of soil in the Low pH area consists of tunnel muck from the Deer Island outfall project. The average arsenic concentration in soil from the upper 4 feet of this area is 19 mg/kg, while the average lead concentration is 249 mg/kg; the measured pH of these soils is above the remedial target of pH 4. Given these conditions, the on-site reuse of these soils should not result in significant impacts to groundwater or surface water, nor is it expected to result in significant infiltration or migration</p>

	of contaminants.
Somerville-9 via Lightship Engineering, LLC	<p>The source of the metals in area A-5 is attributed to fill. The source of the metals in soil and groundwater at CES-2 and the Low pH area was not identified in the reports reviewed by Lightship Engineering. What is the source of metals detected in soil and groundwater in areas CES-2 and the Low pH area, is it the fill or another source(s)?</p> <p>Response: The source of metals in soil and groundwater at the CES-2 and Low pH area is believed to be related to historic filling practices and/or releases from historic operations.</p>
Somerville-10 via Lightship Engineering, LLC	<p>The GEI Phase III Remedial Action Plan dated August 27, 2013 ("GEI Phase III") indicates groundwater mounding during high tide conditions (Figure 6), abutting the Low pH Area. Why is there mounding of groundwater in this area and is the mounding still evident during low tide? Will the hydrogeologic impact of the ISS, when completed, combined with the mounding observed result in the migration of metals/OHM to other areas on and/or off site as a result in the change to hydrogeologic conditions. Will it exacerbate existing OHM conditions?</p> <p>Response: The source of the mounding depicted on Figure 6 of the GEI Phase III report is not readily apparent; however, groundwater elevation monitoring was conducted during a concurrent geotechnical evaluation of the Site using automated pressure transducers over a multi-day monitoring period. In general, shallow groundwater appears to be locally perched above the organic layer. This may account for the noted mounding. As the goal of the ISS program is to increase groundwater pH to a level above 4, and a relationship between elevated dissolved metal concentrations and groundwater with a pH below 4 has been observed, the successful completion of the ISS program is not anticipated to result in a significant migration of metals/OHM to another on- or off-site area.</p>
Somerville-11 via Lightship Engineering, LLC	<p>What is the hydrogeologic impact to surface water or groundwater with changing tidal elevations (low and high)? Have surface water and groundwater elevations and samples been collected during both low and high tide to assess the change in hydraulic gradients or change in pH or concentration of metals/OHM detected?</p> <p>Response: Groundwater elevation monitoring was conducted during a concurrent geotechnical evaluation of the Site using automated pressure transducers over a multi-day monitoring period. In general, shallow groundwater appears to be locally perched above the organic layer, and does not appear to be significantly affected by the tides. Surface water samples and groundwater seep samples were obtained at low tide, as those samples represent groundwater that is discharging to the Mystic River, as well as "worst case" surface water conditions within the groundwater-to-surface water mixing zone. Further information will be presented in the forthcoming supplemental Phase II – Comprehensive Site Assessment for the water-side portion of the Site.</p>

<p>Somerville-12</p> <p>via Lightship Engineering, LLC</p>	<p>At what depth were the sediment samples collected and submitted for laboratory analysis (0 to 1 ft., 1-3 ft.)? What is the spatial distribution and extent of metals/OHM and pH if any in the seeps and surface water and sediment (vertically and horizontally) adjacent to the landward portion of the site, specifically areas CE-2 and Low pH area, as well as on the Coastal Bank or further into the Mystic River?</p> <p>Response: Additional surface water and sediment data will be presented in the forthcoming supplemental Phase II – Comprehensive Site Assessment for the water-side portion of the Site. The current RAM Plan does not include any response actions involving surface water or sediment.</p>
<p>Somerville-13</p> <p>via Lightship Engineering, LLC</p>	<p>Does the new data change the opinions or conclusions set forth in the GEI Phase IH associated with surface water and sediment or other environmental media? Does this change the scope or extent of the RAM or create a need to concurrently conduct response actions on the Coastal Bank or sediment in the Mystic River?</p> <p>Response: Details concerning the surface water and sediment data will be presented in the forthcoming supplemental Phase II – Comprehensive Site Assessment for the water-side portion of the Site. The Pre-Construction RAM Plan was developed as a risk-reduction measure to address contaminants on the landward side of the top of Coastal Bank prior to initiation of construction. Additional remedial activities related to the water-side of the top of Coastal Bank will be addressed as part of the construction-related RAM Plan.</p>
<p>Somerville-14</p> <p>via Lightship Engineering, LLC</p>	<p>Are the impacts to sediment and/or surface water a result of the impacts from the landward portion of the site, local conditions or both? Does this change the scope or extent of the RAM or need to concurrently conduct response actions on the Coastal Bank or sediment in the Mystic River?</p> <p>Response: See Somerville-13</p>
<p>Somerville-15</p> <p>via Lightship Engineering, LLC</p>	<p>Acidic pH conditions were observed in groundwater that correspond to concentrations of metals exceeding Upper Concentration Limits spatially located directly adjacent to the Coastal Bank as well as surface water and sediment in the Mystic River. Has an updated ecological Imminent Hazard ("IH") evaluation been conducted (40.0955(3)(a) or (b)) or a Risk to Safety (40.0960(3)(c)) evaluation based upon the results of the new GZA data that also includes the recent seep, surface water and sediment sampling and analysis that is yet to be provided to the public? An IH is not likely but Lightship Engineering has not reviewed data to determine if this is the case or any information indicating an IH evaluation has been conducted based upon the result of the new GZA data.</p> <p>Response: See Somerville-13</p>
<p>Somerville-16</p>	<p>There appears to be an ecological Substantial Hazard Condition (40.0956 {2}(d) and/or (e)). Is the purpose of the RAM to abate the Substantial Hazard</p>

via Lightship Engineering, LLC	<p>Condition?</p> <p>Response: See Somerville 13</p>
Somerville-17 via Lightship Engineering, LLC	<p>The GEI Phase III addressed many of the items noted above but considerable new data has been generated by GZA. Does the new data change the GEI Phase III assumptions concerning the impact to surface water and sediment and associated MCP risk related conditions and conclusions?</p> <p>Response: See Somerville-13</p>
Kelleher-1	<p>In the Draft of the Public involvement plan, my concerns are related to the contaminants of the site, are they considered hazardous?</p> <p>Response: The contaminants being addressed by the RAM Plan are included on the Massachusetts Oil and Hazardous Material List in the Massachusetts Contingency Plan.</p>
Kelleher-2	<p>How will they be transported from the site?</p> <p>Response: Contaminated soil will be transported off-site via covered truck by licensed haulers under appropriate documentation and in accordance with all local, state and federal environmental regulations.</p>
Kelleher-3	<p>Will they be using roads in Charlestown?</p> <p>Response: See Maharjan-1</p>
Kelleher-4	<p>Also, who will be monitoring this process? An independent agency?</p> <p>Response: See Levesque-5. In addition, of course, MassDEP will be monitoring response actions at the site, and has the right to inspect the site as it feels necessary.</p>
M&E-1	<p>DEP's proposed format appears to favor a cover page to be included with the PIP Plan including PREPARED FOR and PREPARED BY information and contact information for same.</p> <p>Response: The PIP Plan has been revised to include a cover page with the noted information.</p>
M&E-2	<p>When setting forth public comment period end or close dates on draft documents being made available for public comment in the future, please include the following language immediately after the public comment period end or close date: UNLESS EXTENDED AT THE REQUEST OF THE PUBLIC FOR A MINIMUM OF AN ADDITIONAL TWENTY (20) DAYS.</p>

	<p>Response: The requested language will be included in future references to public comment periods.</p>
M&E-3	<p>At Section 2.1 0, Site Description, please include the acreage of the so-called water-side portion of the Site.</p> <p>Response: The assessment of data to develop the extent of the water-side portion of the disposal site is ongoing. Details concerning these findings will be incorporated into the supplemental Phase II – Comprehensive Site Assessment for the water-side portion of the Site.</p>
M&E-4	<p>At Section 4.23 and Exhibit II, confirm that Wynn and GZA will hold meetings for all RAM plans and completion statements (currently says that it will do so for RAMs associated with "pre-construction remediation" and "construction related activities").</p> <p>Response: Confirmed. The text at Section 4.23 and Exhibit II will be changed accordingly.</p>
M&E-5	<p>Establish a Public Information Station at an accessible and visible area at the perimeter of the Site and include real-time reporting of the perimeter air testing results that will be undertaken at the site during remediation activities, as well as emergency and non-emergency contact information.</p> <p>Response: The project information area to be created at the perimeter of the site will provide emergency contact information. The air quality monitoring (dust monitoring) results will be summarized on the project web site. Any air quality issues deemed as urgent should be reported to the project team by the emergency contact numbers provided.</p>
M&E-6	<p>At Section 4.23, confirm that Wynn/GZA will provide a minimum of fourteen (14) days advance notice prior to any public meeting.</p> <p>Response: GZA and Wynn will attempt to provide notice of future public meetings at least 14 days in advance.</p>
M&E-7	<p>When distributing draft documents for review in the PIP process, include upfront summaries using layperson's language, understandable to the general public.</p> <p>Response: See Levesque-1.</p>
M&E-8	<p>Circulate drafts of documents to be discussed at properly noticed PIP meetings at least 2 to 3 days prior to said meetings to enable more efficient review and discussion at meetings.</p> <p>Response: See Levesque-3.</p>



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EXHIBIT II

COMMUNITY CONCERNS

EXHIBIT II

COMMUNITY CONCERNS ABOUT THE (FORMER) EVERETT STAGING YARD DISPOSAL SITE

A. Concerns about the nature and extent of contamination

Interviewees were aware of the historic use of the site by Monsanto and other chemical manufacturing facilities, and were aware of residual contamination resulting from those operations, but expressed confusion and/or lack of information over the nature and extent of contaminants. Interviewees were hopeful that the PIP process would serve to educate the public about site contamination.

B. Concerns about routes of exposure and neighborhood health issues

Interviewees expressed concerns regarding the potential for contaminant exposure to nearby receptors, including adjoining properties and nearby residents, via dust.

C. Concerns about the site remediation process

Interviewees expressed concerns regarding exposure to contaminated soils from the disposal site, specifically related to the trucks transporting contaminated soil from the site and the potential for the spread of contamination via dust. Public safety officials stressed the need to be informed of remediation activities that would generate increased traffic (i.e., soil disposal via trucking), and requested weekly updates via email during periods of active remediation.

Interviewees expressed further concerns that site remediation be comprehensive, and not just limited to the installation of a clean soil cap or engineered barrier. Concerns were noted that the remediation should take into account exposures via land, water and air, and also address future land uses and receptors (building workers, children, etc.).

Interviewees requested that any significant new findings or changes be communicated.

D. Concerns about opportunities for public involvement during the remedial response action process

Interviewees expressed an interest in having discussions about the remedial response action process expressed in layman's terms, and in having ample detail provided to facilitate a better understanding of the site and the cleanup process.

Additional public meetings were requested (beyond the initial PIP Plan meeting). Interviewees expressed an interest in having meetings corresponding to applicable MCP submittals. Certain public officials requested weekly updates, via email, during phases

of active remediation. Recommended methods of publicizing meetings included the use of Everett TV and posted announcements.

E. Other Concerns

The request was made to use both the main Everett library (Parlin) and the newly renovated branch library (Shute) as public information repositories.

Interviewees requested that public meetings be held either at City Hall or at the Connolly Center.



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EXHIBIT III

PIP MAILING LIST

Name	Address	City, State Zip	Phone	Title	Dear Line	Method of Receipt	email address
Evmorphia Stratis	43 Corey Street	Everett, MA 02149	6172324211	Lead Petitioner	PIP Petitioner:	Mail and Email	evmorphia@gmail.com
Dennis John Gianatassio	9 Hawthorn Street	Everett, MA 02149	6173872011	Petitioner	PIP Petitioner:	Mail and Email	dligianatassio777@hotmail.com
Lee Prather	6 Porter Street	Everett, MA 02149	6173876240	Petitioner	PIP Petitioner:	Mail	
Josephine Chisholm	130 Central Avenue	Everett, MA 02149	6173872887	Petitioner	PIP Petitioner:	Mail	
Barbara DeVito	234 Shute Street	Everett, MA 02149	6173890403	Petitioner	PIP Petitioner:	Mail	
Edward D'Agostino	30 Chelsea Street	Everett, MA 02149	6173877599	Petitioner	PIP Petitioner:	Mail	
Pat Badolato	142 School Street	Everett, MA 02149		Petitioner	PIP Petitioner:	Mail	
Patricia Millard	23 Partridge Terrace	Everett, MA 02149		Petitioner	PIP Petitioner:	Mail	
Patricia Denbow	1 Marie Ave	Everett, MA 02149	8572449675	Petitioner	PIP Petitioner:	Mail	
Albert Ragucci	37 Plymouth Street	Everett, MA 02149	6173870617	Petitioner	PIP Petitioner:	Mail	
Paula O'Brien	75 Woodville St, #2	Everett, MA 02149	6173877704	Petitioner	PIP Petitioner:	Mail	
John E. Conway, Jr	75 Woodville St, #2	Everett, MA 02149	6173877704	Petitioner	PIP Petitioner:	Mail	
Buddah Maharjan	7 Scott Place	Everett, MA 02149		Petitioner	PIP Petitioner:	Mail	
Carlo de Maria, Jr.	City Hall, 484 Broadway	Everett, MA 02149	6173942270	Mayor	Dear Mayor:	Mail	mayorcarlo.demaria@ci.everett.ma.us
Sean F. Connolly	City Hall, 484 Broadway	Everett, MA 02149	6173942255	Chairman, Everett Board of Health	Dear Chairman:	Mail	
MassDEP	205B Lowell Street	Wilmington, MA 01887	9786943200		To whom it may concern:	Mail	
Massachusetts Gaming Comm	101 Federal Street, 23rd Flo	Boston, MA 02110		Mr. Stephen Crosby, Chair	Dear Chairman:	Mail	
Mayor's Office	1 City Hall Plaza	Boston, MA 02201		Mayor Martin J. Walsh	Dear Mayor:	Mail	mayor@boston.gov
	Boston Public Health Commission						
	1010 Massachusetts Avenue	Boston, MA 02118		Director	Dear Director:	Mail	
Dr. Huy Nguyen							
Mayor's Office	93 Highland Avenue	Somerville, MA 02143		Mayor Joseph A. Curtatone	Dear Mayor:	Mail	
City Hall Annex	50 Evergreen Avenue	Somerville, MA 02145		Health Department Director	Dear Director:	Mail	
McCarter & English	265 Franklin Street	Boston, MA 02110		Leigh A. Gilligan	Dear Attorney Gilligan:	Mail	
Environmental & Sustainability	484 Broadway	Everett, MA 02149		Michael Gove	Dear Mr. Gove:	Mail	michael.gove@ci.everett.ma.us
WES Consultants	65 E India Row, Unit 36DE	Boston, MA 02110		Wesley Simpson	Dear Mr. Simpson:	Mail	
David Rodrigues	484 Broadway	Everett, MA 02149	617-394-2231	Assistant City Solicitor	Dear Mr. Rodrigues:	Mail	david.rodrigues@ci.everett.ma.us
Alba Cruz-Diaz	484 Broadway	Everett, MA 02149	617-394-2251	Acting Director, Everett Health Department	Dear Ms. Cruz-Diaz	Mail	alba.cruzdavis@ci.everett.ma.us
Sal N. DiDomenico	State House, Room 208	Boston, MA 02133	617-722-1651	State Senator	Dear Senator DiDomenico	Mail	Sal.DiDomenico@masenate.gov
Joseph W. McGonagle	State House, Room 134	Boston, MA 02133	617-722-2401	State Representative	Dear Representative McGo	Mail	joseph.mcgonagle@mahouse.gov
David T. Butler	Everett Fire Department 384 Broadway Everett Police Headquarters 45 Elm Street	Everett, MA 02149	617-387-7191	Chief	Dear Chief Butler:	Mail	david.butler@cityofeverett.gov
Steven A. Mazzei		Everett, MA 02149	617 394-2120	Chief	Dear Chief Mazzei:	Mail	steven.mazzei@cityofeverett.org
Charlotte Moffat	1 City Hall Plaza, Room 709	Boston, MA 02201		Executive Secretary	Dear Ms. Moffat:	Mail	charlotte.moffat@boston.gov
Francis X. Wright, Jr.	93 Highland Avenue	Somerville, MA 02143	617-625-6601	Somerville City Solicitor	Dear Mr. Wright:	Mail	law@somervillema.gov
Oliver Sellers-Garcia	93 Highland Avenue	Somerville, MA 02143	617-666-3311	Somerville Director of Substantiability	Dear Mr. Sellers-Garcia	Mail	ogarcia@somervillema.gov
Lynne C Levesque				Petitioner	Dear M. Levesque	Email	lynnelevesque@gmail.com
Ann Kelleher				Petitioner	Dear Ms. Kelleher	Email	joy02129@gmail.com
Maura T. Zlody, LEED AP BD+C	One City Hall Square, Room 21	Boston, MA 02201	617-635-4421	Senior Environmental Policy Analyst	Dear Ms. Zlody	Mail	maura.zlody@boston.gov
David M. Barlow	21 Wellington Street	Arlington, MA 02476-6509			Dear Mr. Barlow	Email	avidmb@gmail.com
Rusty Russel, J.D., AICP					Dear Mr. Russell	Email	rustynet@comcast.net
Kay Conway	69 Cleveland Avenue	Everett, MA 02149		Petitioner	PIP Petitioner:	Email	kconway1234@yahoo.com



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EXHIBIT IV

SCHEDULE FOR PUBLIC INVOLVEMENT ACTIVITIES

EXHIBIT IV

SCHEDULE FOR PUBLIC INVOLVMENT ACTIVITIES

The following list includes known milestone MCP reports for which PIP meetings will be held, and the anticipated meeting dates:

Milestone	Scheduled or Anticipated Meeting Date
Construction-Related RAM Plan	February 17, 2016
Pre-Construction RAM Completion Report	Mid 2016
Sediment Phase III and IV Report	Mid 2016
Construction-Related RAM Completion Report	Mid 2017
Permanent Solution Statement	Late 2017



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